

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE



RENEE M. BUTZ,

Plaintiff,

v.

LAWNS UNLIMITED LTD. and  
EDWARD FLEMING,


Defendants.

Civ. No. 05-495-JJF  
Judge Joseph J. Farnan Jr.

**PLAINTIFF'S REQUEST FOR MOTION TO ADD CLAIM**

Plaintiff, Renee M. Butz, hereby requests to add a claim for Pain and Suffering and Punitive Damages to the Second Amended Complaint.

1. Defendants have asked for and subpoenaed for Plaintiff's medical history through both Interrogatories and Production of Documents, therefore acknowledging Plaintiff's claim for pain and suffering.
2. Judge Joseph J. Farnan, Jr. has recognized that both Plaintiff and Defendants' have acknowledged the Plaintiff's claim for pain and suffering and emotional distress.
3. Punitive damages and pain and suffering damages were discussed between Plaintiff and Defendants' with regards to a previously submitted settlement offer of April 9, 2007.
4. Punitive damages are sought to teach small business owners that employment laws pertain to them and they cannot discriminate against employees under Title VII of the Civil Rights Act of 1964.

  
Renee M. Butz  
58 Hickory Drive  
North East, MD 21901  
(410) 441-4300  
Plaintiff pro se

Dated: 8/13/07

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AFFIDAVIT OF SERVICE

I hereby affirm that a true and correct copy of the Plaintiff's Request for Motion to Add Claim was sent by email and by first-class United States mail, postage duly paid, on this 13 day of August, 2007, to the following:

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Plaintiff pro se

Dated: 8/13/07